

REMARKS AND ARGUMENTS

Applicants respectfully request reconsideration and allowance of all of the claims of the application. Claims 1 and 12-15 are presently pending. Without conceding the propriety of the rejections herein and in the interest of expediting prosecution, Applicants amend claim 1 herein, to clarify claimed features. Such amendments are merely intended to clarify the claimed features, and should not be construed as further limiting the claimed invention in response to the cited references.

New claims added herein are 21 to 25. These new claims are fully supported by the Application and therefore do not constitute new matter. New claims are allowable over the cited reference because they depend from independent claim 1, which is allowable for the following reasons.

Claim Rejections under 35 USC § 102

Claims 1 and 12-15 are rejected under 35 U.S.C. 102(e) as being anticipated by US 2002/0199082 ("Shanmugasundram et al."). Applicants respectfully disagree.

The Application describes a method for automating validation in a manufacturing facility. The method comprises defining process requirements, selecting and integrating automated devices for manufacturing and inter-connecting the automated devices to a hub-box. Processing data is collected to facilitate process validation, which comprises at least one evidentiary document to establish that the process consistently satisfies the pre-defined process requirements.

Shanmugasundram et al. describes a technology for producing a product, where the production facility includes parallel production of assembly lines of products on identically configured chambers, tools, and/or modules. See, for example, Shanmugasundram et al. at Abstract. Control is provided between such chambers. Behaviors of a first batch of wafers are

collected and processed by one of the identically configured chambers to produce the microelectronic device. The information relating to the behavior is shared with a controller of another of the identically configured chambers, process tools and/or modules, to provide an adjustment of the process tool and thereby to produce a second batch which is substantially identical, within tolerance, to the first batch.

For the reasons set forth below, Applicants respectfully submit that Shanmugasundram et al. does not anticipate the rejected claims. Accordingly, Applicants respectfully request that the §102 rejections be withdrawn and the case be passed along to issuance.

Independent Claim 1

Applicants respectfully submit that Shanmugasundram et al. does not anticipate this claim because it does not disclose at least the following elements, as recited in this claim as amended (with emphasis added):

- “a method of **automating validation of a manufacturing process**”
- “interconnecting the automated devices to a **hub-box** via communication links, the hub-box controls and facilitates communication between the automated devices and **validation of the manufacturing process**, wherein the validation **includes generating an organized set of documents, defining aspects of the process, in conformance with regulatory standards;**”

Applicants respectfully submit that Shanmugasundram et al. does not teach or suggest “a method of **automating validation** of a manufacturing facility.” In fact, nowhere in Shanmugasundram et al. discusses “**validation**” of a manufacturing facility, as recited in this claim.

The Examiner has equated the claimed “hub-box” to the Separate Module Controller (SMC) 1701 or controller 2001 described in Shanmugasundram et al. See Action page 2. The SMC contains “module level models” that provide for automatically setting process tools results targets. See Shanmugasundram et al. paragraph [0080]. The SMC 1701 merely controls the peer tools 1705, and does not **facilitate validation** of the manufacturing process, including generating “an organized set of documents, defining aspects of the process, in conformance with regulatory standards.” See, for example, Shanmugasundram et al. at paragraph [0081]. Similarly, the controller 2001 communicates with the process tools 2005 but does not facilitate **validation** of the process, as required by this claim. See, for example, Shanmugasundram et al. at paragraph [0084].

Consequently, Shanmugasundram et al. does not disclose all of the elements and features of claim 1. Accordingly, Applicants ask the Examiner to withdraw the rejection of this claim.

Dependent Claims 12-15, 21-25

With respect to claims 12-15, 21-25, these claims depend either directly or indirectly from independent claim 1. As discussed above, claim 1 is allowable. It is axiomatic that any dependent claim which depends from an allowable base claim is also allowable. Additionally, some or all of these claims may also be allowable for additional independent reasons. Therefore, Applicants respectfully traverse the rejections of these claims and ask the Examiner to withdraw the rejection of these claims.

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Conclusion

In view of the foregoing, Applicants believe that all claims now pending in this application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

Should the Examiner believe that a telephone conference would expedite prosecution of this application, please telephone the undersigned attorney at his number set out below.

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Respectfully submitted,

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